

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS, )

Plaintiff, )

VS. )

ERIC H. HOLDER, JR. in his )  
official capacity as Attorney )  
General of the United States, )

Defendant, )

ERIC KENNIE, et al, )

Defendant-Intervenors, )

TEXAS STATE CONFERENCE OF )  
NAACP BRANCHES, )

Defendant-Intervenors, )

TEXAS LEAGUE OF YOUNG VOTERS )  
EDUCATION FUND, et al, )

Defendant-Intervenors, )

TEXAS LEGISLATIVE BLACK )  
CAUCUS, et al, )

Defendant-Intervenors, )

VICTORIA RODRIGUEZ, et al., )

Defendant-Intervenors. )

CASE NO. 1:12-CV-00128  
(RMC-DST-RLW)  
Three-Judge Court

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ORAL DEPOSITION OF  
STATE OF TEXAS 30(b)(6)

LEE GUYETTE  
JUNE 19, 2012

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Toll Free: 800.211.DEPO  
Facsimile: 202.296.8652

Suite 350  
1425 K Street NW  
Washington, DC 20005  
www.esquiresolutions.com

1 ORAL DEPOSITION OF LEE GUYETTE, produced as a  
2 witness at the instance of the Defendant, was duly  
3 sworn, was taken in the above-styled and numbered cause  
4 on the JUNE 19, 2012, from 3:13 p.m. to 6:09 p.m.,  
5 before Chris Carpenter, CSR, in and for the State of  
6 Texas, reported by machine shorthand, at the Offices of  
7 the Texas Attorney General, 209 West 14th Street, 6th  
8 Floor, Austin, TX 78701, pursuant to the Federal Rules  
9 of Civil Procedure and the provisions stated on the  
10 record or attached hereto.  
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25



## A P P E A R A N C E S

## FOR THE PLAINTIFF, STATE OF TEXAS:

Patrick K. Sweeten  
Reynolds Brissenden  
OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
P.O. Box 12548  
Austin, TX 78711-2548  
  
209 West 14th Street  
8th Floor  
Austin, TX 78701  
(512) 936-1307  
patrick.sweeten@texasattorneygeneral.gov

## FOR THE DEFENDANT, HOLDER, ET AL:

Daniel Freeman  
Victor Williamson  
U.S. DEPARTMENT OF JUSTICE  
950 Pennsylvania Avenue, NW  
NWB - Room 7202  
Washington, DC 20530  
(202) 305-7766  
daniel.freeman@usdoj.gov



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## EXHIBITS

NO.	DESCRIPTION	PAGE MARKED
971	E-mail string, January 25-27, 2011	22
972	E-mail string, January 27 thru February 1, 2011	28
973	E-mail string, November 15-16, 2011	45
974	E-mail string, November 7 thru December 9, 2011	47
975	E-mail string, January 25, 2011	49
976	Mendoza E-mail, January 25, 2011 1:03 p.m.	60
977	Mendoza E-mail, January 25, 2011 3:35 p.m.	63



1 Richards, received copies of this analysis?

2 A. I see the intent of the e-mail, but I don't  
3 know if it went beyond the group that you mentioned.

4 Q. Who is Coby?

5 A. That would be Deputy Secretary Coby Shorter,  
6 Secretary of State.

7 Q. And the top of this e-mail, does Ms. McGeehan  
8 state that she has attached a draft summary that she  
9 will send to Coby and John so that they can distribute  
10 to legislative folk?

11 A. That's correct. And to clarify, the John that  
12 she's referencing is likely the John Sepehri, who was  
13 general counsel.

14 Q. Okay. And to the extent of your knowledge, did  
15 this distribution end with Coby and John?

16 A. To be honest with you, I don't even know if it  
17 went to Coby and John. This is the extent of my  
18 knowledge.

19 Q. Okay. All I can ask you for is the extent of  
20 your knowledge.

21 A. That's...

22 Q. Now, if you can look back real quickly at  
23 Exhibit 491. Do you see on Wednesday, January 26th, at  
24 just before 4:00 p.m., Karen Richards sent out an e-mail  
25 saying that some queries had already been done, some



Toll Free: 800.211.DEPO  
Facsimile: 202.296.8652

Suite 350  
1425 K Street NW  
Washington, DC 20005  
[www.esquiresolutions.com](http://www.esquiresolutions.com)